1 2 3 4 5 6 7 8	SIGAL CHATTAH United States Attorney District of Nevada Nevada Bar No. 8264  KARISSA D. NEFF Assistant United States Attorney Nevada Bar No. 12504 501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101 (702) 388-6533 Karissa.Neff@usdoj.gov  Attorneys for the Federal Defendant	
9	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
10	Wild Horse Education, a non-profit	Case No. 3:25-cv-00152-MMD-CSD
11	corporation,	Stipulation and Order to Extend Time
12	Plaintiffs,	to Answer
13	V.	(First Request)
14	United States Department of Interior, Bureau of Land Management,	
15 16	Defendant.	
17	Pursuant to Rule 6(b)(1) of the Federal	Rules of Civil Procedure and Rule IA 6-1 of
18	this Court's Local Rules, Plaintiff Wild Horse Education, and Federal Defendant United	
19	States Department of Interior, Bureau of Land Management, through undersigned counsel,	
20	hereby stipulate and agree as follows:	
21	Plaintiff filed its Complaint for Declaratory and Injunctive Relief on March 18,	
22	2025. ECF No. 1.	
23	Plaintiff served Federal Defendant with a copy of the Summons and Complaint via	
24	U.S. certified mail on April 22, 2025.	
25	The current deadline for Federal Defendant to respond to Plaintiff's Complaint is	
26	May 22, 2025.	
27	On May 19, 2025, undersigned counsel for Plaintiff and Federal Defendant agreed	
28	to a 21-day extension of time for Federal Defe	ndant to review the record and continue

1	gathering information from agency counsel. The standard for extending time is good cause.	
2	See FRCP 6(b)(1)(A).	
3	Accordingly, the parties, through undersigned counsel, submit this stipulation to a	
4	21-day extension from May 22, 2025, to and including <b>June 12, 2025</b> , for Federal	
5	Defendant to file an answer or otherwise respond to the Complaint. This is Federal	
6	Defendant's first request for an extension of time.	
7	This stipulated request is filed in good faith and not for the purposes of undue delay.	
8	Respectfully submitted this 21st day of May 2025.	
9	BRENT M. RESH SIGAL CHATTAH	
10	Nevada Bar No. 14940 United States Attorney Brent Resh Law, PLLC	
11	2401 La Solana Way	
12	brent@brentreshlaw.com  Assistant United States Attorney	
13	<u>/s/ Jessica L. Blome</u>	
14	J. RAE LOVKO Greenfire Law, PC	
15	2748 Adeline Street, Suite A Berkeley, CA 94703	
16	jblome@greenfirelaw.com rlovko@greenfirelaw.com	
17	Attorneys for the Plaintiff	
18	IT IC CO ORDERED.	
19	IT IS SO ORDERED:	
20	0 - 0	
21	UNITED STATES MAGISTRATE JUDGE	
22	UNITED STATES MAGISTRATE JUDGE	
23	<b>DATED:</b> May 22, 2025	
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